BOSTON EDISON
Pilgrim Nuclear Power Station
Rocky Hill Road
Plymouth, Massachusetts 02360

April 30, 1991
BECo Ltr. 91-062

George W. Davis
Senior Vice President – Nuclear

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Docket No. 50-293
License No. DPR-35

Subject: BOSTON EDISON COMPANY'S RESPONSE TO NRC REGION I INSPECTION REPORT 50-293/90-80

Dear Sir:

The NRC Maintenance Team Inspection was conducted at Pilgrim Nuclear Power Station on November 5-16, 1990 and December 10-20, 1990. The subject inspection report identified two weaknesses that involved the overall planning and supervision of maintenance activities and the procedure review process. Attached is Boston Edison Company's response to the two weaknesses.

In general, the report provides an assessment of the Pilgrim maintenance program that is consistent with our internal assessments. The recent initiatives to improve overall maintenance are having a positive effect on the conduct of maintenance. Further refinements to the maintenance program will help ensure continued improvement.

Please do not hesitate to contact me if there are any questions or comments regarding the attached response.

G. W. Davis

TFM/bal

Attachment: Response to Maintenance Team Inspection Report No. 50-293/90-80

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Attachment

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Described below is the response to the two weaknesses identified during the Maintenance Team Inspection (MTI) conducted November 5-16, 1990 and December 10-20, 1990.

I. The first item concerned the weakness within the overall planning and supervision of maintenance activities that hinders the effective execution of tasks. A number of improvements have been made to strengthen this area.

- Supervisory oversight of ongoing maintenance activities has been increased by relieving the first line supervisors of certain duties not directly related to their job descriptions. For example, the Work Control Division now ensures work packages are fully ready to work prior to release. This function was previously done by the first line supervisors.

- Training of the maintenance supervisors has been enhanced. INPO Observation Training has been given to all maintenance supervisors except for three off duty supervisors who will receive this training upon their return to work. The training provides the supervisors with a better understanding of key attributes to consider for job activity oversight. Additionally, Station Instruction SI-MT.1000 "Maintenance Section Manual", has been revised to include core requirements for Maintenance Supervisor/Manager Training. These training requirements are being incorporated into each supervisor's personnel development plan. This will help ensure standardized training for maintenance supervision to increase their supervisory knowledge and skills.

- The production work force has been restructured into teams, each assigned to a specific first line supervisor. Each team is responsible for their assigned maintenance activity throughout the entire work control process. This concept helps create an increased feeling of ownership for maintenance activity results. The use of teams makes better use of the craft's experience and provides advanced knowledge of the work requirements as the team performs initial review of assigned work packages.

- Procedure 1.5.3 "Maintenance Requests" was revised in March 1991 to enhance the efficiency of the work control process. One of the changes was the creation of the Work Request Tag (WRT). The WRT is written by plant personnel to identify a maintenance problem. The hard copy of the WRT is hung on the equipment and the carbon copy of the tag is forwarded to the Work Prioritization Team (WPT). Each working day the WPT reviews the WRTs for determination of the work scope, walkdown of job, duplication review, job planning, prioritization and Maintenance Request (MR) generation. By completing this detailed review prior to MR generation, the efficiency of the work control process is increased.

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Additionally, minor work items on non-safety related components not affecting plant operations may be completed provided the Nuclear Watch Engineer or Nuclear Operations Supervisor are notified and the senior WPT member concurs. This process helps ensure efficient use of available maintenance resources.

The work control enhancements described above have been implemented since October 1990 to resolve weaknesses identified by self-assessments and the MTI. Further quality of workmanship improvements have resulted from a formalized rework program that includes root cause analysis and corrective action. In addition, a Maintenance Quality Improvement Program has been implemented. This program reviews work practices of each production division to identify areas for improvement. The effectiveness of the work control process upgrade is continuously monitored through the Maintenance Quality Improvement Program and maintenance performance indicators.

II. The second item concerned the procedure review process that failed to identify certain deficiencies that still existed when the lubrication sampling and change procedure was revised. Improvements have been made to the procedure review and lubrication sampling programs to strengthen these areas.

- The procedure review process was enhanced in January 1991. Procedure 1.3.4 "Procedures" was revised to add a new section on procedure technical reviews. Procedure 1.3.4-4 "Procedure Technical Review and Validation" was also revised in January 1991. This major revision incorporated the procedure technical review process and specific acceptance criteria was added for use by the technical reviewer. The technical review acceptance criteria includes provisions for the reviewer to ensure the procedure implements the requirements or purpose that the procedure is intended to satisfy. Additionally, the reviewer ensures quantitative and qualitative acceptance criteria are included in the procedure. The addition of the technical review will help ensure all necessary information is included in procedure revisions.

- The lubrication sampling and change program was reviewed and Procedure 3.M.4-17.4 "Lubrication Sampling and Change Procedure" was revised in January 1991. This was a major rewrite that added specific acceptance criteria and corrective actions. The Preventive Maintenance Coordinator is required to review data from each report and any recommendations from the laboratory. The Coordinator compares the current data to previous report data and to the acceptance criteria specified in the procedure. If corrective action is indicated by this review, the Preventive Maintenance Coordinator notifies the Nuclear Watch Engineer or Nuclear Operations Supervisor immediately. The Preventive Maintenance Coordinator also initiates a Failure and Malfunction Report if a laboratory analysis report indicates oil in safety-related equipment is not suitable for continued use or could jeopardize operation. The laboratory analysis report is also forwarded by the Preventive Maintenance Coordinator to the Systems Engineering Group for monitoring and trending.

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The addition of the specific acceptance criteria and required corrective actions for the analyzed elements will help ensure potential problems are identified in a timely manner so the appropriate corrective actions can be taken.

III. Conclusion

We recognize the importance of an excellent maintenance program to help ensure continued safe plant operation. Our self-assessment practices have contributed to the positive results achieved. Further refinements to the maintenance program identified by self-assessments will help ensure continued improvement.